

Exhibit B

From: [Carly D. Fraker](#)
To: support@pipermall.com
Cc: [Jenny T. Slocum](#)
Subject: Piper Mall Website and Use of Carhartt's Trademarks
Date: Tuesday, April 14, 2020 5:15:26 PM
Attachments: [Piper Mall Letter.pdf](#)

Dear Sir/Madam,

Please find attached a letter regarding your unauthorized use of the Carhartt Marks in connection with the Piper Mall website. If you have any questions or would like to discuss, please let us know.

Regards,

Carly



1825 EYE STREET, N.W. SUITE 900
WASHINGTON, DC 20006-5403
TELEPHONE: (202) 457-0160
FACSIMILE: (844) 670-6009
<http://www.dickinsonwright.com>

JENNY T. SLOCUM
JSlocum@dickinsonwright.com
(202) 659-6927

April 14, 2020

Piper Mall
Email: support@pipermall.com

VIA E-MAIL

Re: Unauthorized Use of Carhartt's Trademarks on Facemasks, Clothing, and Blankets

Dear Sir/Madam:

We represent Carhartt, Inc. ("Carhartt") in intellectual property matters. Carhartt owns exclusive rights in the CARHARTT name and trademark including in connection with its stylized "C" logo as depicted below for clothing, headwear, footwear and related items (the "Carhartt Marks"). Carhartt has made extensive use of these marks, including on clothing for over 50 years, and the marks are famous. As a result, our client has developed a significant reputation in connection with the Carhartt Marks.



It has recently come to our client's attention that you are offering for sale unauthorized CARHARTT branded products, including but not limited to facemasks, sweatshirts, and blankets. See https://pipermall.com/?s=Carhartt&post_type=product. These counterfeit products include direct copies of Carhartt's famous C Logo and CARHARTT mark, identical use and layout of the Carhartt protected font, and direct reference to "Carhartt" as the product names on your website. Screenshots reflecting your sale and distribution of these unauthorized items are copied below and at the top of the following page (see also Exhibits):



Carhartt #6 This Is How I Save The World
\$24.95 - \$79.95



Carhartt #9 3D FM
\$24.95 - \$79.95



Carhartt #8 3D FM
\$24.95 - \$79.95



Carhartt Punisher Premium 3D FM
\$24.95 - \$79.95

Piper Mall
 April 14, 2020
 Page 2



Carhartt American Warrior 3D FM
 \$24.95 - \$79.95



Carhartt Personalized Custom
 Limited Design 3D Full Print
 Hoodie, T Shirt, Jacket, Pant, Polo
 \$34.99 - \$99.50



Carhartt Personalized Custom
 Classic Design 3D Full Print Hoodie,
 T Shirt, Jacket, Pant, Polo
 \$34.99 - \$99.50



Carhartt Classic But Amazing
 Premium Quality Leather Jacket -
 40% OFF
 \$99.95



Carhartt Classic But Amazing High
 Quality Baseball Jacket
 \$59.99



Carhartt Classic 3D Full Print
 Blanket
 \$74.99 - \$84.99



Carhartt Classic 3D Full Print
 Hoodie, T Shirt, Jacket, Pant, Polo
 \$34.99 - \$99.50



Carhartt Best Design Ever In Gray
 3D Full Print Blanket
 \$74.99 - \$84.99

Such unauthorized use of the Carhartt Marks is a direct and egregious infringement of our client's trademark rights. The sale and distribution of these unauthorized counterfeit products falsely labelled as Carhartt products, and containing the Carhartt Marks, creates a likelihood of confusion and will lead consumers to mistakenly believe such products were designed, manufactured and distributed by Carhartt, or on behalf of Carhartt. Our client has not approved such use of its marks.

The purpose of this letter is to demand that you **immediately** cease and desist from any further use, sales, or display of the Carhartt Marks. In this regard, we require that you provide us by no later than **April 17, 2020**, and **in writing**:

1. confirmation that you have removed these products from any and all websites, retail stores, social media accounts, and any other location currently displaying, advertising and/or selling the same or similar variations;
2. confirmation that you have ceased all sales of these unauthorized items through any retail channels, including the Piper Mall website, as well as any affiliated retail channels;

Piper Mall
April 14, 2020
Page 3

3. the identification of the designer, source, and manufacturer of these counterfeit products;
4. a full accounting of all inventory sold, the revenue collected and all inventory currently remaining in your possession bearing the Carhartt Marks; and
5. your undertaking that you will permanently refrain from any further distribution, advertisement, promotion and sale of any product bearing a Carhartt Mark or any similar variations thereof.

In addition, our client requires that you send all remaining inventory to our offices, to my attention at the address shown on this correspondence, by no later than April 22, 2020.

We have also submitted an intellectual property take down notice to your website, as well as a message via your "Contact Us" link. A copy of the submission request is included below. Your prompt cooperation is appreciated.

Please contact me with any questions.

Sincerely,



Jenny Slocum

cc: Carhartt, Inc.

Piper Mall
 April 14, 2020
 Page 4

EXHIBITS

CONTACT US TRACK ORDER DMCA (REPORT DESIGN)

Search Results for: CARHARTT

Home / Shop / Search results for "Carhartt" Showing 1-20 of 27 results Filters +

Carhartt #6 This Is How I Save The World \$24.95 - \$79.95

Carhartt #9 3D FM \$24.95 - \$79.95

Carhartt #8 3D FM \$24.95 - \$79.95

Carhartt Punisher Premium 3D FM \$24.95 - \$79.95

Carhartt #2 3D FM \$24.95 - \$79.95

Carhartt #1 3D FM \$24.95 - \$79.95

Carhartt Colour 3D FM \$24.95 - \$79.95

Carhartt American Flag 3D FM \$24.95 - \$79.95

75% OFF 40% SALE OFF

2:33 PM 4/14/2020

https://pipermall.com/?s=Carhartt&post_type=product

Piper Mall
 April 14, 2020
 Page 5

CONTACT US TRACK ORDER DMCA (REPORT DESIGN) **Pipermall** Creative - Diversified Login / Register

Carhartt American Warrior 3D FM
 \$24.95 - \$79.95

Carhartt Personalized Custom Limited Design 3D Full Print Hoodie, T Shirt, Jacket, Pant, Polo
 \$34.99 - \$99.50

Carhartt Personalized Custom Classic Design 3D Full Print Hoodie, T Shirt, Jacket, Pant, Polo
 \$34.99 - \$99.50

Carhartt Classic But Amazing Premium Quality Leather Jacket - 40% OFF
 \$99.95

Carhartt Classic But Amazing High Quality Baseball Jacket
 \$59.99

Carhartt Classic 3D Full Print Blanket
 \$74.99 - \$84.99

Carhartt Classic 3D Full Print Hoodie, T Shirt, Jacket, Pant, Polo
 \$34.99 - \$99.50

Carhartt Best Design Ever In Gray 3D Full Print Blanket
 \$74.99 - \$84.99

75% 2:34 PM 4/14/2020

https://pipermall.com/?s=Carhartt&post_type=product

Piper Mall
 April 14, 2020
 Page 6

The screenshot shows a web browser window displaying the PiperMall website. The address bar shows the URL: https://pipermall.com/page/2/?s=Carhartt&post_type=pr. The search bar contains the text "Search Results for 'Carhartt...". The website header includes navigation links: CONTACT US, TRACK ORDER, DMCA (REPORT DESIGN), and a Login / Register link. The main content area is titled "SEARCH RESULTS FOR: CARHARTT" and shows four Carhartt products with their descriptions and prices. The footer contains corporate information, contact details, and social media links.

SEARCH RESULTS FOR: CARHARTT

Home / Shop / Search results for "Carhartt" / Page 2

Showing 21-24 of 24 results Filters +

Product Image	Product Name	Price Range
	Carhartt Never Fade 3D Full Print Hoodie, T Shirt, Jacket, Pant, Polo	\$34.99 - \$59.99
	Carhartt Classic But Amazing 3D Full Print Hoodie, T Shirt, Jacket, Pant, Polo	\$34.99 - \$59.99
	Carhartt Best Design Ever 3D Full Print Blanket	\$74.99 - \$84.99
	Carhartt Best Design Ever 3D Full Print Hoodie, T Shirt, Jacket, Pant, Polo	\$34.99 - \$59.99

Page 2

CORPORATE

- Contact Us
- Privacy Policy
- DMCA
 - Acceptable Use Policy Violation
 - Intellectual Property Claim
- TERMS OF SERVICE

INFORMATION

- Track Order
- Refund & Return
- Shipping & Delivery
- TERMS OF SERVICE

MORE INFO

- support@pipermall.com
- Support Time: 8h30 AM : 5h30 PM

VISA AMEX MasterCard DISCOVER PayPal

© 2019 PiperMall.com. All rights reserved.
 Currency: USD (US Dollar)

f t e p in

75% 2:35 PM 4/14/2020

https://pipermall.com/page/2/?s=Carhartt&post_type=product

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Listing of the Piper Mall Campaign Url(s) contained on the Piper Mall Website:
https://pipermall.com/?s=Carhartt&post_type=product

Individual Product URLs:

<https://pipermall.com/product/carhartt-8-3d-fm/>
<https://pipermall.com/product/carhartt-punisher-premium-3d-fm/>
<https://pipermall.com/product/carhartt-2-3d-fm/>
<https://pipermall.com/product/carhartt-1-3d-fm/>
<https://pipermall.com/product/carhartt-colour-3d-fm/>
<https://pipermall.com/product/carhartt-american-flag-3d-fm/>
<https://pipermall.com/product/carhartt-american-warrior-3d-fm/>
<https://pipermall.com/product/design-qdn0197cus-3d-full-print/>
<https://pipermall.com/product/design-qdn0184cus-3d-full-print/>
<https://pipermall.com/product/0490-high-quality-leather-jacket/>
<https://pipermall.com/product/design-0158-high-quality-baseball-jacket/>
<https://pipermall.com/product/blanket-design-5522/>
<https://pipermall.com/product/design-5522/>
<https://pipermall.com/product/blanket-design-4723/>
<https://pipermall.com/product/design-4723/>
<https://pipermall.com/product/blanket-design-3915/>
<https://pipermall.com/product/design-3915/>
<https://pipermall.com/product/blanket-design-3561/>
<https://pipermall.com/product/design-3561/>
<https://pipermall.com/product/blanket-design-3113-3d-full-print/>
<https://pipermall.com/product/design-3113-3d-full-print/>
<https://pipermall.com/product/design-2417-3d-full-print/>
<https://pipermall.com/product/design-2242-3d-full-print/>
<https://pipermall.com/product/design-0905-3d-full-print-blanket/>
<https://pipermall.com/product/design-0905-3d-full-print/>

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https://pipermall.com/product/carhartt-1-3d-fm/ Carhartt #1 3D FM – PiperMall

CONTACT US TRACK ORDER DMCA (REPORT DESIGN) Login / Register

Home / Face Mask / Carhartt #1 3D FM

Carhartt #1 3D FM
\$49.95

Usually, one filter can be used for 30 days, It is recommended to change at any time during heavy pollution periods

Filter Activated Carbon PM 2.5 FM

SECURED VISA MasterCard American Express Discover PayPal

Combo: 5 MASKS & 15 FILTERS
 Clear

1 ADD TO CART

Add to wishlist

Category: Face Mask

Tag: Carhartt

Share: f t e p in

Description Additional information Reviews (0) Shipping & Delivery

Usually, one filter can be used for 30 days, It is recommended to change at any time during heavy pollution periods

Filter Activated Carbon PM 2.5 FM

Filter Activated Carbon?PM 2.5 FM. Do you have problem with dust chemicals, smoke and particles. Do you want to enjoy a free outdoor life? Common Filter? It has no effect. Moving purifying respirator? It is large and burden. That's a good reason to buy this Filter Activated Carbon PM 2.5 FM. Refused to be a human vacuum cleaner. A must-have for outdoor activity suitable for dust, anti-vehicle exhaust, anti-pollen allergy, PM2.5, for cycling, hiking, skiing, and other outdoor activities.

75% 2:37 PM 4/14/2020

<https://pipermall.com/product/carhartt-1-3d-fm/>

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 Page 9

Browser address bar: <https://pipermall.com/product/design-qdn0197cus-3d-fu>

Page title: Carhartt Personalized Custom Limited Design 3D Full Print Hoodie, T Shirt, Jacket, Pant, Polo

Navigation: CONTACT US TRACK ORDER DMCA (REPORT DESIGN) Login / Register

Product Name: Carhartt Personalized Custom Limited Design 3D Full Print Hoodie, T Shirt, Jacket, Pant, Polo

Price: \$54.99

Options amount: \$0.00

Final total: \$54.99

Buttons: ADD TO CART

Footer: ARIZONA CALIFORNIA FLORIDA KENTUCKY MICHIGAN NEVADA OHIO TENNESSEE TEXAS TORONTO WASHINGTON DC

<https://pipermall.com/product/design-qdn0197cus-3d-full-print/>

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https://pipermall.com/product/design-5522/ Carhartt Classic 3D Full Prin...

CONTACT US TRACK ORDER DMCA (REPORT DESIGN) Login / Register

Home / Apparel / Carhartt Classic 3D Full Print Hoodie, T Shirt, Jacket, Pant, Polo

Carhartt Classic 3D Full Print Hoodie, T Shirt, Jacket, Pant, Polo

\$54.99

NOT SOLD IN STORES
 Tip: Free shipping for orders over \$100

SECURED VISA MASTERCARD AMERICAN EXPRESS DISCOVER PayPal

Style: Normal Hoodie

Size: L

✖ Clear

- 1 + ADD TO CART

♥ Add to wishlist

Categories: A-League, Apparel

Tag: Carhartt

Share: f t e p in

Description Additional information Reviews (0) Shipping & Delivery

When you have your correct measurements, you can easily Find Your Size

- Because of lighting and display, there will be a little color difference, please understand.
- Item Material: Tixi (Cotton 35% + PE 65%). We won't accept changing/refunding request if you just do not like this material

YOU MAY ALSO LIKE...


75% 2:39 PM 4/14/2020

<https://pipermall.com/product/design-5522/>






ARIZONA CALIFORNIA FLORIDA KENTUCKY MICHIGAN
 NEVADA OHIO TENNESSEE TEXAS TORONTO WASHINGTON DC

Piper Mall
 April 14, 2020
 Page 11

The screenshot shows a web browser window displaying the Piper Mall website. The address bar shows the URL: <https://pipermall.com/product/blanket-design-4723/>. The page features a large image of a black quilted blanket with the Carhartt logo and 'carhartt workwear' text. To the right of the image, the product title is 'Carhartt Best Design Ever In Gray 3D Full Print Blanket' with a price of '\$84.99'. Below the price, it states '**NOT SOLD IN STORES**' and 'Tip: Free shipping for orders over \$100'. There are payment logos for Visa, Mastercard, American Express, Discover, and PayPal. A size selector is set to 'King'. Below the size selector is a quantity selector set to '1' and an 'ADD TO CART' button. Further down, there are links for 'Add to wishlist', 'Categories: A-League, Blanket', 'Tag: Carhartt', and social media share icons for Facebook, Twitter, Email, Pinterest, and LinkedIn. At the bottom of the page, there is a navigation bar with links for 'Description', 'Additional information', 'Reviews (0)', and 'Shipping & Delivery'. Below the navigation bar, there is a section titled 'When you have your correct measurements, you can easily Find Your Size' with two bullet points: 'Because of lighting and display, there will be a little color difference, please understand.' and 'Item Material: Tixi (Cotton 35% + PE 65%). We won't accept changing/refunding request if you just do not like this material'. The bottom of the browser window shows a status bar with '75%' zoom, '2:40 PM', and '4/14/2020'.

CONTACT US TRACK ORDER DMCA (REPORT DESIGN)  Login / Register

Home / Blanket / Carhartt Best Design Ever In Gray 3D Full Print Blanket

Carhartt Best Design Ever In Gray 3D Full Print Blanket
\$84.99
 NOT SOLD IN STORES
 Tip: Free shipping for orders over \$100
 SECURED VISA MASTERCARD AMERICAN EXPRESS DISCOVER PAYPAL
 Size: King
 ✖ Clear
 - 1 + ADD TO CART
 Add to wishlist
 Categories: A-League, Blanket
 Tag: Carhartt
 Share:     

Description Additional information Reviews (0) Shipping & Delivery

When you have your correct measurements, you can easily Find Your Size

- Because of lighting and display, there will be a little color difference, please understand.
- Item Material: Tixi (Cotton 35% + PE 65%). We won't accept changing/refunding request if you just do not like this material

75% 2:40 PM 4/14/2020

<https://pipermall.com/product/blanket-design-4723/>

Piper Mall
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https://pipermall.com/product/design-0158-high-quality- Carhartt Classic But Amazing High Quality _ Base Ball Jacket

CONTACT US TRACK ORDER DMCA (REPORT DESIGN) Login / Register

Home / Tool / Carhartt Classic But Amazing High Quality _ Base Ball Jacket

Carhartt Classic But Amazing High Quality _ Base Ball Jacket

\$59.99

NOT SOLD IN STORES

SECURED VISA MasterCard American Express Discover PayPal

All products are made-to-order and proudly printed with the best screen printing or print to garment processes available.

Why Buy From Us?

- > Low Prices Everyday
- > Safe & Secure Ordering
- > Google Trusted Store
- > 90 Day? 100% Money-Back-Guarantee!
- > Award-Winning Customer Service!
- > 100% No Questions Asked Money-Back-Guarantee?
- > We Ship Worldwide / To Every?Country
- > Tracking Number?s Available

Limited stock available hurry and grab yours today!

Color: Navy

Size: L

✖ Clear

- 1 + ADD TO CART

♥ Add to wishlist

75% 2:40 PM 4/14/2020

ARIZONA CALIFORNIA FLORIDA KENTUCKY MICHIGAN
 NEVADA OHIO TENNESSEE TEXAS TORONTO WASHINGTON DC

<https://pipermall.com/product/design-0158-high-quality-baseball-jacket/>

Piper Mall
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DMCA Request

https://pipermall.com/dmca/intellectual-property-claim/ Intellectual Property Claim ...

File Edit View Favorites Tools Help

Convert Select

CONTACT US TRACK ORDER DMCA (REPORT DESIGN) Login / Register

INTELLECTUAL PROPERTY CLAIM

Home / DMCA / Intellectual Property Claim

Campaign Url(s) (required)

mall.com/product/design-2242-3d-full-print/; https://pipermall.com/product/design-0905-3d-full-print-blanket/; https://pipermall.com/product/design-0905-3d-full-print/

Your Contact Information

First Name (required)

Jenny

Last Name (required)

Slocum

Address Line 1 (required)

1825 I St N.W., Suite 900, Washington, D.C. 20006

States

District of Columbia

Country (required)

United States

Your Email (required)

JSlocum@dickinsonwright.com

Phone Number (required)

202-659-6927

IP Claim Details

Are you the Rights Owner or an Agent? (required)

☐ Rights Owner ☒ Agent

IP Owner (Legal Name)


Carhartt, Inc.

The specific concern is (required)

75%

4:36 PM
4/14/2020

Piper Mall
 April 14, 2020
 Page 14

CONTACT US TRACK ORDER DMCA (REPORT DESIGN)  Login / Register

☐ Rights Owner ☒ Agent

IP Owner (Legal Name)
 Carhartt, Inc.

The specific concern is (required)
 Carhartt, Inc. owns exclusive IP rights in the CARHARTT name and trademark including its stylized "C" logo for clothing, headwear, footwear and related items worldwide, i

URL(s) to original work (required)
 www.carhartt.com

Additional Information (Optional)
 These products are direct counterfeit products. We request disclosure of all identifying information that Piper Mall has in its possession concerning the total inventory sold, as

Statement

* I have a good faith belief that content(s) in the campaign described above violate(s) my rights described above or those held by the rights owner, and that the use of such content(s) is contrary to law.






* I declare, under penalty of perjury, that the information completed above is correct and accurate and that I am the owner or agent of the owner of the rights described above.






☒ I have read and accept the statements above.

SUBMIT

CORPORATE
 Contact Us
 Privacy Policy
 DMCA
 > Acceptable Use Policy Violation
 > Intellectual Property Claim
 TERMS OF SERVICE

INFORMATION
 Track Order
 Refund & Return
 Shipping & Delivery
 TERMS OF SERVICE

MORE INFO
 support@pipermall.com
 Support Time: 8h30 AM : 5h30 PM
    

© 2019 PiperMall.com. All rights reserved.
 Currency: USD (US Dollar)
    

75% 4:37 PM 4/14/2020

Piper Mall
 April 14, 2020
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“Contact Us” Submission:

The screenshot shows a web browser window with the URL <https://pipermall.com/contact-us/>. The page title is "Contact Us | PiperMall.com". The browser's address bar shows the URL and the page title. The page has a navigation bar with links: CONTACT US, TRACK ORDER, DMCA (REPORT DESIGN), and a login/register link. The main heading is "CONTACT US" with a breadcrumb trail: Home / Contact Us.

The form fields are filled as follows:

- Your Name (required):** Jenny Slocum and Carly Fraker
- Your Email (required):** JSlocum@dickinsonwright.com
- Subject:** Unauthorized Use of Carhartt Marks at https://pipermall.com/?s=Carhartt&post_type=product Website
- Your Message:**

We represent [Carhartt, Inc.](#) ("[Carhartt](#)") in intellectual property matters. [Carhartt](#) owns exclusive IP rights in the CARHARTT name and trademark including its stylized "C" logo for clothing, headwear, footwear and related items worldwide, including in both the United States and Canada. [Carhartt's](#) registered US trademarks include Reg. Nos. 1193235, 4302600, 4385038, 1836639, 1841700, 3595490, 5229413. [Carhartt](#) has made extensive use of these marks on clothing for over 50 years, and the marks are famous. The seller of the [Carhartt](#)-branded products advertised and sold via the URL campaign listed above (https://pipermall.com/?s=Carhartt&post_type=product) is not authorized to do so by [Carhartt](#). This seller is directly and egregiously infringing upon [Carhartt's](#) intellectual property rights through the marketing, sales, and distribution of these direct counterfeit products. We request disclosure of all identifying information that Piper Mall has in its possession concerning the total inventory sold, as well as the designer and source of these counterfeit products. We also request written confirmation that all counterfeit products have been removed and will no longer be sold via your website.

A "SEND" button is visible below the message field.

The footer contains three columns of links:

- CORPORATE:** Contact Us, Privacy Policy, DMCA, > Acceptable Use Policy Violation, > Intellectual Property Claim, TERMS OF SERVICE
- INFORMATION:** Track Order, Refund & Return, Shipping & Delivery, TERMS OF SERVICE
- MORE INFO:** support@pipermall.com, Support Time: 8h30 AM - 5h30 PM, and logos for VISA, AMEX, MasterCard, DISCOVER, and PayPal.

© 2019 PiperMall.com. All rights reserved.

The browser window shows a zoom level of 75% and the time 4:41 PM on 4/14/2020.

From: [Carly D. Fraker](#)
To: support@creestock.com
Cc: [Jenny T. Slocum](#)
Subject: Cree Stock Website and Use of Carhartt's Trademarks
Date: Tuesday, April 14, 2020 5:15:32 PM
Attachments: [Cree Stock Letter.pdf](#)

Dear Sir/Madam,

Please find attached a letter regarding your unauthorized use of the Carhartt Marks in connection with the Cree Stock website. If you have any questions or would like to discuss, please let us know.

Regards,

Carly



1825 EYE STREET, N.W. SUITE 900
WASHINGTON, DC 20006-5403
TELEPHONE: (202) 457-0160
FACSIMILE: (844) 670-6009
<http://www.dickinsonwright.com>

JENNY T. SLOCUM
JSlocum@dickinsonwright.com
(202) 659-6927

April 14, 2020

Cree Stock
17600 Yonge St
Newmarket, ON L3Y 4Z1
Canada
Email: support@creestock.com

VIA E-MAIL

Re: Unauthorized Use of Carhartt's Trademarks on Facemasks, Clothing, and Blankets

Dear Sir/Madam:

We represent Carhartt, Inc. ("Carhartt") in intellectual property matters. Carhartt owns exclusive rights in the CARHARTT name and trademark including in connection with its stylized "C" logo as depicted below for clothing, headwear, footwear and related items (the "Carhartt Marks") in both the United States and Canada. Carhartt has made extensive use of these marks, including on clothing for over 50 years, and the marks are famous. As a result, our client has developed a significant reputation in connection with the Carhartt Marks.



It has recently come to our client's attention that you are offering for sale unauthorized CARHARTT branded products, including but not limited to facemasks, sweatshirts, and blankets. See https://creestock.com/?s=Carhartt&post_type=product. These counterfeit products include direct copies of Carhartt's famous C Logo and CARHARTT mark, identical use and layout of the Carhartt protected font, and direct reference to "Carhartt" as the product names on your website. Screenshots reflecting your sale and distribution of these unauthorized items are copied below and at the top of the following page (see also Exhibits):



Carhartt Punisher Premium 3D FM
\$24.95 - \$79.95



Carhartt #3 3D FM
\$24.95 - \$79.95



Carhartt #2 3D FM
\$24.95 - \$79.95



Carhartt #13 3D FM
\$24.95 - \$79.95

Cree Stock
 April 14, 2020
 Page 2



Carhartt Classic But Amazing High Quality ??? Baseball Jacket

4.4 (4.4)

Select options



Carhartt Classic Personalized Custom 3D Full Print Blanket

\$74.99 - \$84.99



Carhartt Classic Personalized Custom 3D Full Print Hoodie, T Shirt, Jacket, Pant, Polo

\$34.99 - \$99.50



Carhartt Best Design Ever In Gray Personalized Custom 3D Full Print Blanket

\$74.99 - \$84.99



Carhartt Best Design Ever In Gray Personalized Custom 3D Full Print Hoodie, T Shirt, Jacket, Pant, Polo



Carhartt Classic But Amazing In Gray Personalized Custom 3D Full Print Blanket



Carhartt Classic But Amazing In Gray Personalized Custom 3D Full Print Hoodie, T Shirt, Jacket, Pant, Polo



Carhartt New Design Personalized Custom 3D Full Print Hoodie, T Shirt, Jacket, Pant, Polo

Such unauthorized use of the Carhartt Marks is a direct and egregious infringement of our client's trademark rights. The sale and distribution of these unauthorized counterfeit products falsely labelled as Carhartt products, and containing the Carhartt Marks, creates a likelihood of confusion and will lead consumers to mistakenly believe such products were designed, manufactured and distributed by Carhartt, or on behalf of Carhartt. Our client has not approved such use of its marks.

The purpose of this letter is to demand that you **immediately** cease and desist from any further use, sales, or display of the Carhartt Marks. In this regard, we require that you provide us by no later than **April 17, 2020**, and **in writing**:

1. confirmation that you have removed these products from any and all websites, retail stores, social media accounts, and any other location currently displaying, advertising and/or selling the same or similar variations;
2. confirmation that you have ceased all sales of these unauthorized items through any retail channels, including the Cree Stock website, as well as any affiliated retail channels;

Cree Stock
April 14, 2020
Page 3

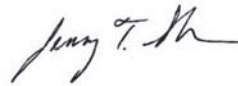
3. the identification of the designer, source, and manufacturer of these counterfeit products;
4. a full accounting of all inventory sold, the revenue collected and all inventory currently remaining in your possession bearing the Carhartt Marks; and
5. your undertaking that you will permanently refrain from any further distribution, advertisement, promotion and sale of any product bearing a Carhartt Mark or any similar variations thereof.

In addition, our client requires that you send all remaining inventory to our offices, to my attention at the address shown on this correspondence, by no later than April 22, 2020.

We have also submitted an intellectual property take down notice to your website, as well as a message via your "Contact Us" link. A copy of the submission request is included below. Your prompt cooperation is appreciated.

Please contact me with any questions.

Sincerely,



Jenny Slocum

cc: Carhartt, Inc.

Cree Stock
April 14, 2020
Page 4

EXHIBITS



SEARCH RESULTS FOR: CARHARTT

Home / Shop / Search results for "Carhartt"

Showing 1-20 of 28 results Filters +



Carhartt #9 3D FM

\$24.95 - \$79.95



Carhartt #8 3D FM

\$24.95 - \$79.95



Carhartt Punisher Premium 3D FM

\$24.95 - \$79.95



Carhartt #3 3D FM

\$24.95 - \$79.95



Carhartt #2 3D FM

\$24.95 - \$79.95



Carhartt #1 3D FM

\$24.95 - \$79.95



Carhartt Colour 3D FM

\$24.95 - \$79.95



Carhartt

\$24.95 - \$79.95



Carhartt

\$24.95 - \$79.95



BLANKET - Carhartt Color Waves
Personalized Custom 3D Full Print
Hoodie, T Shirt, Jacket, Pant, Polo

\$74.99 - \$84.99



Carhartt Color Waves Personalized
Custom 3D Full Print Hoodie, T
Shirt, Jacket, Pant, Polo

\$34.99 - \$99.50




Carhartt And Baby Yoda Happy St.
Patrick's Day Hoodie, T Shirt,
Sweatshirt

\$26.95 - \$46.95


https://creestock.com/?s=Carhartt&post_type=product

Cree Stock
 April 14, 2020
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Carhartt Classic But Amazing Hoodie, T Shirt, Sweatshirt

\$28.95 - \$46.95




Carhartt Classic But Amazing Premium Quality Leather Jacket - 40% OFF

\$99.95




Carhartt Classic But Amazing High Quality ??? Baseball Jacket

\$58.99




Carhartt Classic Personalized Custom 3D Full Print Blanket

\$74.99 - \$84.99




Carhartt Classic Personalized Custom 3D Full Print Hoodie, T Shirt, Jacket, Pant, Polo

\$34.99 - \$89.50




Carhartt Best Design Ever In Gray Personalized Custom 3D Full Print Blanket

\$74.99 - \$84.99



Carhartt Best Design Ever In Gray Personalized Custom 3D Full Print Hoodie, T Shirt, Jacket, Pant, Polo

\$34.99 - \$89.50



Carhartt Classic But Amazing In Gray Personalized Custom 3D Full Print Blanket

\$74.99 - \$84.99

1 2 >

RESULTS FROM BLOG

SHOW ALL BLOG RESULTS

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MORE INFO


[✉ Mail: support@creestock.com](mailto:support@creestock.com)
[✉ Address: 17600 Yonge St, Newmarket, ON L3Y 4Z1, Canada](#)
[☎ 1-800-361-6666 \(Toll Free\)](#)

https://creestock.com/?s=Carhartt&post_type=product

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 April 14, 2020
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Home / Shop / Search results for "Carhartt" / Page 2
Showing 21-29 of 29 results **Filters** +




Carhartt Classic But Amazing In Gray Personalized Custom 3D Full Print Hoodie, T Shirt, Jacket, Pant, Polo

\$34.99 - \$99.50




Carhartt New Design Personalized Custom 3D Full Print Hoodie, T Shirt, Jacket, Pant, Polo

\$74.99 - \$84.99




Carhartt New Design Personalized Custom 3D Full Print Hoodie, T Shirt, Jacket, Pant, Polo

\$34.99 - \$99.50




Carhartt New Design Personalized Custom 3D Full Print Hoodie, T Shirt, Jacket, Pant, Polo

\$74.99 - \$84.99




Carhartt New Design Personalized Custom 3D Full Print Hoodie, T Shirt, Jacket, Pant, Polo

\$34.99 - \$99.50




Carhartt Never Fade Personalized Custom 3D Full Print Hoodie, T Shirt, Jacket, Pant, Polo

\$34.99 - \$59.99




Carhartt Classic But Amazing Personalized Custom 3D Full Print Hoodie, T Shirt, Jacket, Pant, Polo

\$34.99 - \$59.99



Carhartt Best Design Ever Personalized Custom 3D Full Print Blanket

\$74.99 - \$84.99



Carhartt Best Design Ever Personalized Custom 3D Full Print Hoodie, T Shirt, Jacket, Pant, Polo

\$34.99 - \$59.99

< 1 **2**

RESULTS FROM BLOG

SHOW ALL BLOG RESULTS

https://creestock.com/page/2/?s=Carhartt&post_type=product

Cree Stock
April 14, 2020
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Listing of the Cree Stock Campaign Url(s) contained on the Cree Stock Website:
https://creestock.com/?s=Carhartt&post_type=product

Individual Product URLs:

<https://creestock.com/product/carhartt-9-3d-fm/>
<https://creestock.com/product/carhartt-8-3d-fm/>
<https://creestock.com/product/carhartt-punisher-premium-3d-fm/>
<https://creestock.com/product/carhartt-3-3d-fm/>
<https://creestock.com/product/carhartt-2-3d-fm/>
<https://creestock.com/product/carhartt-1-3d-fm/>
<https://creestock.com/product/carhartt-colour-3d-fm/>
<https://creestock.com/product/carhartt-2/>
<https://creestock.com/product/carhartt/>
<https://creestock.com/product/blanket-carhartt-color-waves-personalized-custom-3d-full-print-hoodie-t-shirt-jacket-pant-polo/>
<https://creestock.com/product/carhartt-color-waves-personalized-custom-3d-full-print-hoodie-t-shirt-jacket-pant-polo/>
<https://creestock.com/product/dnh0937-2d-print/>
<https://creestock.com/product/dnh0915-2d-print/>
<https://creestock.com/product/0490-high-quality-leather-jacket/>
<https://creestock.com/product/design-0158-high-quality-baseball-jacket/>
<https://creestock.com/product/blanket-design-5522/>
<https://creestock.com/product/design-5522/>
<https://creestock.com/product/blanket-design-4723/>
<https://creestock.com/product/design-4723/>
<https://creestock.com/product/blanket-design-3915/>
<https://creestock.com/product/design-3915/>
<https://creestock.com/product/blanket-design-3561/>
<https://creestock.com/product/design-3561/>
<https://creestock.com/product/blanket-design-3113-3d-full-print/>
<https://creestock.com/product/design-3113-3d-full-print/>
<https://creestock.com/product/design-2417-3d-full-print/>
<https://creestock.com/product/design-2242-3d-full-print/>
<https://creestock.com/product/design-0905-3d-full-print-blanket/>
<https://creestock.com/product/design-0905-3d-full-print/>

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https://creestock.com/product/carhartt-9-3d-fm/ Carhartt #9 3D FM – CreeSt...

CONTACT US TRACK ORDER DMCA (REPORT DESIGN) Login / Register

Home / Face Mask / Carhartt #9 3D FM

Carhartt #9 3D FM
\$49.95

SECURED VISA MASTERCARD DISCOVER AMERICAN EXPRESS PAYPAL

- > Air Pollution Mask with PM 2.5 Filters made of soft material, breathable, washable and reusable.
- > With adjustable nose bridge and hook strap, fit a variety of face, easy and comfortable to wear.
- > !!! Special offers:
 - > Save 33% 5 masks & 15 filters
 - > Save 68% 10 masks & 30 filters

Combo: 5 MASKS & 15 FILTERS Clear

1 ADD TO CART

Add to wishlist

Category: Face Mask

Tag: Carhartt

Share: f t e p in

Description Additional information Reviews (0) Shipping & Delivery

Specification:
 Material: soft fabric, mask with PM 2.5 filter
 Color: as the picture shown

Features:
 1.Soft fabric, comfortable

75% 12:51 PM 4/14/2020

<https://creestock.com/product/carhartt-9-3d-fm/>

Cree Stock
 April 14, 2020
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https://creestock.com/product/design-3561/ Carhartt New Design Perso...

File Edit View Favorites Tools Help

Convert Select

Page Safety Tools

CONTACT US TRACK ORDER DMCA (REPORT DESIGN)

CreeStock
Creative Credibility

Login / Register

Home / Worldwide / Carhartt New Design Personalized Custom 3D Full Print Hoodie, T Shirt, Jacket, Pant, Polo

Carhartt New Design Personalized Custom 3D Full Print Hoodie, T Shirt, Jacket, Pant, Polo

\$54.99

NOT SOLD IN STORES
 Tip: Free shipping for orders over \$100

SECURED VISA MasterCard AMERICAN EXPRESS DISCOVER PAYPAL

Style: Normal Hoodie

Size: L

Clear

Personalization Text On Front (Optional)
 Replace Text on front of the clothes by Your Text

Your Text On Front

15 characters remaining

\$0.00

Personalization Text On Hand (Optional)
 Replace Text on the hand of the clothes by Your Text

Your Text On Hand

15 characters remaining

\$0.00

Options amount
\$0.00

Final total
\$54.99

- 1 + ADD TO CART

♥ Add to wishlist

75%

12:52 PM
 4/14/2020

<https://creestock.com/product/design-3561/>

Cree Stock
 April 14, 2020
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https://creestock.com/product/blanket-carhartt-color-wa

BLANKET - Carhartt Color Waves Personalized Custom 3D Full Print Hoodie, T Shirt, Jacket, Pant, Polo

CONTACT US TRACK ORDER DMCA (REPORT DESIGN) Login / Register

Home / Blanket / BLANKET - Carhartt Color Waves Personalized Custom 3D Full Print Hoodie, T Shirt, Jacket, Pant, Polo

BLANKET - Carhartt Color Waves Personalized Custom 3D Full Print Hoodie, T Shirt, Jacket, Pant, Polo

\$84.99

NOT SOLD IN STORES
 Tip: Free shipping for orders over \$100

Size: King

*Customer's Text (Free)

Options amount
\$0.00

Final total
\$84.99

ADD TO CART

Add to wishlist

Categories: Blanket , Custom Front or Back

Tag: Carhartt

Share: f t e p in

Description Additional information Reviews (0) Shipping & Delivery

75% 1:00 PM 4/14/2020

<https://creestock.com/product/blanket-carhartt-color-waves-personalized-custom-3d-full-print-hoodie-t-shirt-jacket-pant-polo/>

Cree Stock
 April 14, 2020
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The screenshot displays a web browser window with the URL <https://creestock.com/product/0490-high-quality-leather-jacket>. The browser's address bar shows the page title "Carhartt Classic But Amazing...". The website header includes navigation links: CONTACT US, TRACK ORDER, DMCA (REPORT DESIGN), and a login/register link. The Cree Stock logo, "Creative Credibility", is prominently displayed. Below the header, a breadcrumb trail reads: Home / Tool / Carhartt Classic But Amazing Premium Quality Leather Jacket - 40% OFF.

The main content area features a large image of a brown Carhartt leather jacket with a yellow Carhartt logo on the sleeve. A red "40% SALE OFF" banner is overlaid on the image. To the left of the main image are three smaller images showing different views of the jacket. Below these images are up and down arrow buttons. To the right of the main image, the product title "Carhartt Classic But Amazing Premium Quality Leather Jacket - 40% OFF" is displayed, followed by the price "\$167.00 \$99.95". A note states "**NOT SOLD IN STORES**". Below the price, there are logos for "SECURED" (with a padlock icon), VISA, MasterCard, American Express, Discover, and PayPal. A paragraph states: "All products are made-to-order and proudly printed with the best screen printing or print to garment processes available." Below this, a section titled "Why Buy From Us?" lists several benefits: Low Prices Everyday, Safe & Secure Ordering, Google Trusted Store, 90 Day's 100% Money-Back-Guarantee!, Award-Winning Customer Service!, 100% No Questions Asked Money-Back-Guarantee!, We Ship Worldwide / To Every Country, and Tracking Number's Available.

Below the list, a message states: "Limited stock available hurry and grab yours today!". There are two dropdown menus for "Color:" (set to "Brown") and "Size:" (set to "L"). A "Clear" link is provided below the size dropdown. Below these, there are two sections for personalization: "Personalization Text On Front (Optional)" and "Personalization Text On Hand (Optional)". Each section has a text input field and a "Replace Text on front of the clothes by Your Text" or "Replace Text on the hand of the clothes by Your Text" instruction. The "Personalization Text On Front" section shows "Your Text On Front" in the input field and "15 characters remaining" below it. The "Personalization Text On Hand" section shows "Your Text On Hand" in the input field. Below the personalization sections, there is a "75%" zoom indicator and a timestamp "1:00 PM 4/14/2020".

<https://creestock.com/product/0490-high-quality-leather-jacket/>

Cree Stock
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https://creestock.com/product/design-0158-high-quality- Carhartt Classic But Amazing High Quality ??? Baseball Jacket

CONTACT US TRACK ORDER DMCA (REPORT DESIGN) Login / Register

Home / Tool / Carhartt Classic But Amazing High Quality ??? Baseball Jacket

Carhartt Classic But Amazing High Quality ??? Baseball Jacket
\$59.99

NOT SOLD IN STORES

SECURED VISA MASTERCARD AMERICAN EXPRESS DISCOVER PAYPAL

All products are made-to-order and proudly printed with the best screen printing or print to garment processes available.

Why Buy From Us?

- > Low Prices Everyday
- > Safe & Secure Ordering
- > Google Trusted Store
- > 90 Day?s 100% Money-Back-Guarantee!
- > Award-Winning Customer Service!
- > 100% No Questions Asked Money-Back-Guarantee!
- > We Ship Worldwide / To Every?Country
- > Tracking Number?s Available

Limited stock available hurry and grab yours today!

Color: Navy

Size: L

Personalization Text On Front (Optional)
 Replace Text on front of the clothes by Your Text
 Your Text On Front
 15 characters remaining
 \$0.00

Personalization Text On Hand (Optional)
 Replace Text on the hand of the clothes by Your Text
 Your Text On Hand
 15 characters remaining

75% 1:01 PM 4/14/2020

<https://creestock.com/product/design-0158-high-quality-baseball-jacket/>

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DMCA Request:

The screenshot shows a web browser window with the URL <https://creestock.com/dmca/intellectual-property-claim/>. The browser's address bar shows the page title "Intellectual Property Claim". The browser's menu bar includes File, Edit, View, Favorites, Tools, and Help. The browser's toolbar includes a search icon, a home icon, a star icon, a settings icon, and a smiley face icon. The browser's status bar shows the page title "Intellectual Property Claim".

The Cree Stock logo is visible in the top right corner of the page. The logo consists of a red hand icon with the text "CreeStock" in black and "Creative Credibility" in smaller text below it. To the right of the logo is a link "Login / Register".

The main heading of the page is "INTELLECTUAL PROPERTY CLAIM". Below the heading is a breadcrumb trail: "Home / DMCA / Intellectual Property Claim".

The form contains the following sections:

- Campaign Url(s) (required)**: A text input field containing the URL "product/blanket-design-3561/; https://creestock.com/product/design-3561/; https://creestock.com/product/blanket-design-3113-3d-full-print/; https://creestock.com/product/".
- Your Contact Information**:
 - First Name (required)**: A text input field containing "Jenny".
 - Last Name (required)**: A text input field containing "Slocum".
 - Address Line 1 (required)**: A text input field containing "1825 I St N. W., Suite 900, Washington, D.C. 20006".
 - States**: A dropdown menu showing "District of Columbia".
 - Country (required)**: A dropdown menu showing "United States".
 - Your Email (required)**: A text input field containing "JSlocum@dickinsonwright.com; CFraker@dickinsonwright.com; DWTrademarks@dickinsonwright.com".
 - Phone Number (required)**: A text input field containing "202-659-6927".
- IP Claim Details**:
 - Are you the Rights Owner or an Agent? (required)**: A radio button selection with "Rights Owner" and "Agent" options. The "Agent" option is selected.
 - IP Owner (Legal Name)**: A text input field containing "Carhartt, Inc.".
 - The specific concern is (required)**: A text input field that is currently empty.

The bottom of the page features a dark blue footer with the following text:

ARIZONA CALIFORNIA FLORIDA KENTUCKY MICHIGAN
 NEVADA OHIO TENNESSEE TEXAS TORONTO WASHINGTON DC

The bottom right corner of the page shows the time "3:53 PM" and the date "4/14/2020".

Cree Stock
 April 14, 2020
 Page 14

https://creestock.com/dmca/intellectual-property-claim/ Intellectual Property Claim |...

File Edit View Favorites Tools Help

Convert Select

Page Safety Tools

CONTACT US TRACK ORDER DMCA (REPORT DESIGN) Login / Register

CreeStock
Creative. Credibility.

IP Owner (Legal Name)
 Carhartt, Inc.

The specific concern is (required)
 Carhartt, Inc. owns exclusive IP rights in the CARHARTT name and trademark including its stylized "C" logo for clothing, headwear, footwear and related items worldwide, includ

URL(s) to original work (required)
 www.carhartt.com

Additional Information (Optional)
 These products are direct counterfeit products. We request disclosure of all identifying information that Cree Stock has in its possession concerning the total inventory sold, a

Statement

* I have a good faith belief that content(s) in the campaign described above violate(s) my rights described above or those held by the rights owner, and that the use of such content(s) is contrary to law.

* I declare, under penalty of perjury, that the information completed above is correct and accurate and that I am the owner or agent of the owner of the rights described above.

☒ I have read and accept the statements above.

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 > Intellectual Property Claim
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MORE INFO
 Mail: support@creestock.com
 Address: 17600 Yonge St, Newmarket, ON L3Y 4Z1, Canada
 Support Time: 8h30 AM : 5h30 PM

VISA AMEX MasterCard DISCOVER PayPal

© 2019 CreeStock.com. All rights reserved.
 Currency: USD (US Dollar)

f t e p in

75% 3:53 PM 4/14/2020

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“Contact Us” Submission:

https://creestock.com/contact-us/

Contact Us | CreeStock.com

File Edit View Favorites Tools Help

Convert Select

Page Safety Tools

CONTACT US TRACK ORDER DMCA (REPORT DESIGN)

CreeStock
Creative Credibility

Login / Register

CONTACT US

Home / Contact Us

Your Name (required)
 Jenny Slocum and Carly Fraker

Your Email (required)
 JSlocum@dickinsonwright.com; CFraker@dickinsonwright.com; DWTrademarks@dickinsonwright.com

Subject
 Unauthorized Use of Carhartt Marks at https://creestock.com/?s=Carhartt&post_type=product Website

Your Message

We represent Carhartt, Inc. (“Carhartt”) in intellectual property matters. Carhartt owns exclusive IP rights in the CARHARTT name and trademark including its stylized “C” logo for clothing, headwear, footwear and related items worldwide, including in both the United States and Canada. Carhartt’s registered US trademarks include Reg. Nos. 1193235, 4302600, 4385038, 1836639, 1841700, 3595490, 5229413. Carhartt has made extensive use of these marks on clothing for over 50 years, and the marks are famous. The seller of the Carhartt-branded products advertised and sold via the URL campaign listed above (https://creestock.com/?s=Carhartt&post_type=product) is not authorized to do so by Carhartt. This seller is directly and egregiously infringing upon Carhartt’s intellectual property rights through the marketing, sales, and distribution of these direct counterfeit products. We request disclosure of all identifying information that Cree Stock has in its possession concerning the total inventory sold, as well as the designer and source of these counterfeit products. We also request written confirmation that all counterfeit products have been removed and will no longer be sold via your website.

SEND

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 > Intellectual Property Claim
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✉ Mail: support@creestock.com
 ✉ Address: 17600 Yonge St, Newmarket, ON L3Y 4Z1, Canada
 ✉ Support Time: 8h30 AM : 5h30 PM

VISA AMEX Mastercard DISCOVER PayPal

75% 4:00 PM 4/14/2020